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February 1, 2017

**VIA ELECTRONIC FILING**

Honorable James B. Clark, III  
United States Magistrate Judge  
United States District Court, District of New Jersey  
Martin Luther King Courthouse  
50 Walnut Street, Court Room PO 01  
Newark, New Jersey 07101-0999

**Re: Jeffrey A. Winters and Collection Solutions, Inc., on their own behalf and on behalf of all others similarly situated v. Joseph K. Jones, Esq., et al.**  
**Civil Action No. 2:16-cv-09020-JMV-JBC**  
**MDMC File No. C1347-1265**

Dear Judge Clark:

This firm represents defendants, Laura S. Mann, Esq. and The Law Offices of Laura S. Mann, LLC, in the above matter. Kindly accept this brief correspondence in reply to a letter written by plaintiffs' counsel dated January 30, 2017. We respectfully object to the relief sought in counsel's correspondence.

As with the two other law firms that opposed the relief counsel now seeks, this firm objects to plaintiffs' request for additional time to respond to our clients' Fed.R.Civ.Pro. 12(b)(6) motion. Further, there is no reason for an in-person conference on this matter until defendants' motions are all adjudicated on the merits. Finally and significantly, this firm, on behalf of our clients, has no interest in "discussing the advisability" of mediation proceedings or any alternative dispute resolution as a way of resolving this case.

For these reasons, the Mann defendants object to counsel's request for additional time to respond to defendants' motion and object to counsel's request for a "collegial in-person conference" at this time.

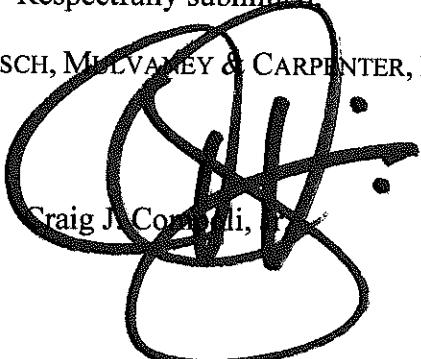
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Thank you.

Respectfully submitted,

McELROY, DEUTSCH, MULVANEY & CARPENTER, LLP

  
Craig J. Connolly, Esq.

CJC:lsd

cc: David M. Hoffman, Esq.  
Meredith Kaplan Stoma, Esq.  
Craig L. Steinfeld, Esq.  
Anthony J. Sylvester, Esq.